

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JENNIFER ECKHART and CATHY AREU,

Plaintiffs,

against

FOX NEWS NETWORK, LLC, ED HENRY,
SEAN HANNITY, TUCKER CARLSON and
HOWARD KURTZ, in their individual and
professional capacities,

Defendants.
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Civil Case No. 1:20-cv-05593

**AFFIDAVIT OF JACOB CHLUDZINSKI IN SUPPORT OF
DEFENDANTS' RULE 11 MOTION FOR SANCTIONS**

I, Jacob Chludzinski, affirm the following to be true under penalty of perjury pursuant to 28 U.S.C. § 1746 and Local Civil Rule 1.9:

1. I am a Project Assistant at the law firm of Jones Day. I am fully familiar with the facts and circumstances set forth herein and make this Affidavit in Support of Defendants' Rule 11 Motion for Sanctions.
2. Exhibit A is a true and correct copy of screenshots of publicly available Instagram posts that Plaintiff Cathy Areu posted after appearances on *Tucker Carlson Tonight*, *Media Buzz*, and *Hannity* from April 28, 2017 to April 5, 2020.

Dated: 9/8/2020

By: Jacob Chludzinski
Jacob Chludzinski